

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

923 Winsray Court, Cincinnati, OH 45224

} Case No.

18 MJ - 278

APR 25 PM 3:14

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
CLERK'S OFFICE

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A to the Affidavit.

located in the Southern District of Ohio, there is now concealed (identify the person or describe the property to be seized):

See Attachment B to the Affidavit.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

evidence of a crime;
 contraband, fruits of crime, or other items illegally possessed;
 property designed for use, intended for use, or used in committing a crime;
 a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section
21 U.S.C. § 846.

Offense Description
Conspiracy to Distribute a Controlled Substance.

The application is based on these facts:

See attached Affidavit.

Continued on the attached sheet.
 Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Chris Dees

Applicant's signature

Chris Dees, TFO/FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

4/25/18

City and state: Cincinnati, OH

Karen L. Litkovitz

Judge's signature

Hon. Karen L. Litkovitz, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR SEARCH WARRANT

I, Chris Dees, a Task Force Officer (TFO) with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state:

INTRODUCTION

1. I am a “federal law enforcement officer” within the meaning of 18 U.S.C. § 2510(7) empowered by law to conduct investigations of and to make arrests for, offenses enumerated in 18 U.S.C. § 2516.
2. I have been a police officer for over thirteen years and have focused on narcotics investigations since 2013. I am assigned as a Task Force Officer (TFO) to the Federal Bureau of Investigation’s Safe Streets Task Force (FBI SSTF). I have conducted and participated in numerous drug trafficking investigations during my career which have resulted in narcotics seizures, seizures of U.S. currency, and the arrest, prosecution, and conviction of numerous subjects in both state and federal courts. I have participated in numerous interviews of individuals involved in the distribution, transportation, and sales of controlled substances and I have had numerous discussions regarding their various operations. I have initiated and participated in surveillance, the operation and debriefing of numerous drug dealers, drug users, and informants, performed both physical and electronic surveillance, and executed search warrants. Further, I have been involved in narcotics investigations that have utilized Title III interceptions of targets and monitored those interceptions.
3. As a result of my experience, I have become familiar with the day-to-day operations of distributors and transporters of controlled substances.

4. The information in this Affidavit is based on my personal investigation, as well as information provided to me by other law enforcement officers involved in this investigation, my review of law enforcement reports and my discussions with other law enforcement agents, confidential sources, and other witnesses. The information contained in this affidavit does not describe the entirety of this investigation, but sets forth only those facts relevant and necessary to determining probable cause for the requested search.
5. Based upon my training and experience, I know:
 - a. That it is common for drug traffickers to maintain multiple premises from which their illegal business is conducted. Drug traffickers also store narcotics, narcotics proceeds, and information relating to the trafficking of narcotics at their residences and businesses and the residences and businesses of relatives and co-conspirators. It is common for drug traffickers to maintain more than one stash location for drugs and drugs proceeds to keep their resources from being vulnerable to loss from a single robbery or police raid. Such traffickers often will have secondary stash locations in areas relatively close to their residence to allow for easy access to them.
 - b. That large scale narcotics traffickers normally need to have ready access to large amounts of U.S. currency in order to maintain and finance their on-going narcotics business;
 - c. That drug traffickers maintain books, records, receipts, notes, ledgers, airline tickets, money orders, passports, ATM receipts, travel records, cellular telephones, vehicle titles, property leases, property purchase agreements, financial transaction receipts, banking records, tax documents, and other documents in paper and electronic formats related to their drug trafficking and money laundering activities. These records include the telephone numbers and contact information of customers and sources, the amount of controlled substances distributed to various customers, along with running totals of debts owed by those customers. They also maintain paraphernalia utilized to cut and package controlled substances. These aforementioned items are commonly maintained in locations to which narcotic traffickers have frequent and ready access, i.e. homes, garages, outbuildings on the property, businesses, and automobiles;
 - d. That it is common for large scale drug traffickers to secrete contraband, proceeds of drug sales, and records of drug transactions in secure locations within residences, vehicles, and businesses they use for ready access and to conceal them from law enforcement authorities;
 - e. That persons involved in large scale drug trafficking operations frequently conceal within their residences, vehicles, and businesses, caches of drugs, large amounts of currency, financial instruments, precious metals, jewelry, automobile titles and other items of value

and proceeds of drug sales and evidence of financial transactions, or spending of large sums of money acquired from engaging in drug trafficking activities;

- f. That when drug traffickers amass large amounts of proceeds from the sales of drugs, the traffickers attempt to legitimize these profits. In order to accomplish these goals, drug traffickers utilize domestic and foreign financial institutions and their attended services, securities, cashier's checks, money drafts, letters of credit, brokerage houses, real estate, shell corporations, and business fronts. Records of these activities are commonly kept in the drug traffickers' residences, vehicles, and businesses, and in areas over which the drug traffickers exercise dominion and control;
- g. That drug traffickers commonly maintain addresses or telephone numbers in books or papers that reflect names, addresses and telephone numbers of their criminal associates in drug trafficking. These items are commonly found in their residences, vehicles, and businesses;
- h. That during drug transactions, traffickers often take, or cause to be taken, photographs of themselves, their associates, drugs, drug proceeds, and paraphernalia associated with drug trafficking. These traffickers usually maintain these photographs at their residences, vehicles, and other properties that they control and well as in cellular phones that they use and store at such locations;
- i. That drug traffickers commonly use electronic equipment to aid them in their drug trafficking activities. This equipment includes, but is not limited to, mobile telephones, computers, computer tablets, digital display pagers, speed dialers, electronic telephone books, electronic date books, money counters, electronic surveillance equipment, eavesdropping equipment, police radio scanners, items that detect electronic equipment utilized by law enforcement and other portable communication devices. These items are commonly found in residences and vehicles used by drug traffickers and in other areas that they control;
- j. That people who traffic in controlled substances frequently maintain firearms to protect both the controlled substances and proceeds derived from their sale from other narcotics traffickers and law enforcement authorities; and
- k. That information in a search warrant application of past events is generally not stale if it can reasonably be believed that the defendant's criminal activity has been ongoing and continues into the recent past.

REQUESTED WARRANTS

6. This affidavit is submitted in support of an application for a search warrant to search the below listed property and to search for and seize certain items at the property (more fully described in Attachment A, incorporated by reference herein):
 - a. **923 Winsray Court, Cincinnati, OH 45224** – This location is the residence for Courtney Webster. Webster has been observed recently staying at this single-family residence. The residence is a Cape Cod style home comprised of mostly brown brick and has a roof with a steep pitch with brown shingles. Looking from the front, the residence has a brick chimney on the left side. The residence has three windows on the front with two on the first level and one on the second level. The windows are trimmed in white. The front door is situated in the center and has a covered porch with four brown support posts. The number “923” appears on one of the brown posts for the front porch. There is a white storm door attached to the front and there are five large bushes all along the front of the residence.
 - b. **Red 2009 model Cadillac with four doors, carrying Ohio license GLJ 8344 and vehicle identification number 1g6df577490163928** – this vehicle is registered to Ciara Hackle and is commonly found in the area of 923 Winsray.
 - c. **Gray 2014 model Toyota Camry with four doors, carrying Ohio license HBC4275 and vehicle identification number 4t1bf1fk9eu339499** – this vehicle is registered to Ciara Hackle and is commonly found in the area of 923 Winsray.
7. The purpose of the search warrant is to locate and seize property which constitutes evidence of – and property used to commit – criminal offenses involving violations of the federal narcotics statutes, specifically, conspiracy to distribute heroin and possession with intent to

distribute heroin. These offenses occurred in the Eastern District of Kentucky and elsewhere, in violation of 21 U.S.C. §§ 841 and 846. These items are listed in Attachment B, incorporated herein.

INVESTIGATION

8. Multiple FBI SSTF informants identified Courtney Webster (aka "C" and "C Murder") as the leader of a group distributing heroin in Covington, Kenton County, Kentucky, and elsewhere. With the help of these informants, agents have been able to identify Keith Johnson, Jonathan Stanley, and Michael Boone as individuals distributing for Webster and driving him to and from transactions. Each informant, CHS#1 and CHS#2, is familiar with the operation of the conspiracy from past dealings. Each has provided information on multiple occasions during the course of this investigation that has proven to be reliable and led to the seizure of controlled substances.
9. Johnson and Boone have been interviewed and provided statements confirming their roles in the conspiracy going back to 2011 and describing its operations in 2017 and 2018. Each indicated that Webster's group has cumulatively distributed more than a kilogram of heroin. Each indicated that Webster commonly carries a handgun while distributing heroin. Boone confirmed that Jonathan Stanley also works as a runner for Webster and makes heroin transactions on behalf of the conspiracy. Johnson is aware from personal observation that Webster regularly stores heroin and drug proceeds in his residence. Johnson has observed this on multiple occasions. Johnson has accompanied Webster on multiple occasions when Webster was renewing his supply of heroin in the Southern District of Ohio.
10. As described below, agents have conducted approximately 23 controlled buys from conspiracy members. Agents monitored each buy through physical and electronic

surveillance. All of the heroin collected from the controlled buys was submitted to the Kentucky State Police Lab for analysis. All of the lab reports that have come back at the time of this affidavit have shown that the substances consistently tested positive for heroin, a Schedule I controlled substance. Three of the lab reports are still pending.

11. On January 18, 2017, CHS#1 contacted Courtney Webster by texting him at 513-655-0216 to set the details of a heroin transaction. CHS#1 subsequently purchased \$70.00 worth of heroin from Courtney Webster and Keith Johnson at the designated location. The purchase took place at the driver's door of Keith Johnson's green Honda Accord bearing KY 018VJF in the 1000 block of Banklick Street in Covington, Kenton County, Kentucky.
12. On January 24, 2017, CHS#1 contacted Courtney Webster by calling him at 513-655-0216 to set the details of a heroin transaction. CHS#1 subsequently purchased \$70.00 worth of heroin from Courtney Webster and Michael Boone at the designated location. The purchase took place at the front passenger door of Michael Boone's black GMC Yukon bearing KY 714DYG in the area of West Robbins and Banklick Street in Covington.
13. On January 30, 2017, CHS#1 contacted Courtney Webster by calling him at 513-655-0216 to set the details of a heroin transaction. CHS#1 subsequently purchased \$140.00 worth of heroin from Courtney Webster and Keith Johnson at the designated location. The purchase took place in the 1000 block of Banklick Street at the driver's door of a red Cadillac bearing OH GLJ8344, registered to Ciara Hackle. I know from my investigation and records that Ms. Hackle is Courtney Webster's wife.
14. On January 31, 2017, CHS#1 contacted Courtney Webster by calling him at 513-655-0216 to set the details of a heroin transaction. CHS#1 subsequently purchased \$70.00 worth of heroin from Keith Johnson at the designated location. The purchase took place at the front

passenger door of the same red Cadillac bearing OH GLJ8344 in the 1000 block of Banklick Street.

15. On January 31, 2017, CHS#2 contacted Courtney Webster by calling him at 513-655-0216 to set the details of a heroin transaction. CHS#2 subsequently purchased \$40.00 worth of heroin from Courtney Webster and Keith Johnson at the designated location. The purchase took place at the front passenger door of the red Cadillac bearing OH GLJ8344 on East 18th Street.
16. On February 1, 2017, CHS#1 contacted Courtney Webster by calling him at 513-655-0216 to set the details of a heroin transaction. CHS#1 subsequently purchased \$70.00 worth of heroin from Courtney Webster at the designated location. The purchase took place at the front passenger door of the red Cadillac bearing OH GLJ8344 on West Robbins Street.
17. On February 2, 2017, CHS#1 contacted Courtney Webster by calling him at 513-655-0216 to set the details of a heroin transaction. CHS#1 subsequently purchased \$70.00 worth of heroin from Courtney Webster at the designated location. The purchase took place at the front passenger door of the red Cadillac bearing OH GLJ8344 on West Robbins Street.
18. On February 2, 2017, CHS#2 contacted Courtney Webster by calling him at 513-655-0216 to set the details of a heroin transaction. CHS#2 subsequently purchased \$40.00 worth of heroin from Courtney Webster at the designated location. The purchase took place at the front passenger door of the red Cadillac bearing OH GLJ8344 in the 1900 block of Garrard Street.
19. On February 9, 2017, CHS#1 contacted Courtney Webster by calling him at 513-655-0216 to set the details of a heroin transaction. CHS#1 then purchased \$40.00 worth of heroin from

Courtney Webster at the designated location. The purchase took place at the front passenger door of an Avis rental car bearing KY 273WKL on West Robbins Street.

20. On August 15, 2017, CHS#2 contacted Courtney Webster by calling him at 513-264-4293 to set the details of a heroin transaction. CHS#2 then purchased \$140.00 worth of heroin from Jonathan Stanley who showed up for the transaction at the designated location in a white pickup truck with an unknown tag and unknown driver. The purchase took place on Banklick Street at the intersection with Berry Street.
21. On August 23, 2017, CHS#1 contacted Courtney Webster by calling him at 513-264-4293 to set the details of a heroin transaction. CHS#1 then purchased \$70.00 worth of heroin from Jonathan Stanley, who showed up at the designated location as a passenger in Jaquan Stanley's black Chrysler bearing Ohio license GWM6753. The purchase took place in the 1400 block of Scott Boulevard.
22. On August 29, 2017, CHS#1 contacted Courtney Webster by calling him at 513-264-4293 to set the details of a heroin transaction. CHS#1 then purchased \$140.00 worth of heroin from Jonathan Stanley at the designated location, the exit to Popeye's Chicken located at 502 Main Street. During the exchange of calls that preceded the transaction, Webster advised the informant at one point to contact him at the 513-655-0216 number. The informant called that number. Another person answered the call and agreed to meet the informant in two minutes. Jonathan Stanley showed up right after that and made the transaction.
23. On September 21, 2017, CHS#1 contacted Courtney Webster by calling him at 513-264-4293 to set the details of a heroin transaction. CHS#1 then purchased \$140.00 worth of heroin from Courtney Webster at the designated location, the Frisch's lot located at 520 West 5th Street. Webster was in the previously described red Cadillac during the transaction.

24. On September 25, 2017, CHS#1 contacted Courtney Webster by calling him at 513-655-0216 to set the details of a heroin transaction. CHS#1 then purchased \$140.00 worth of heroin from Michael Boone at the designated time and place, the intersection of East 16th Street & Oakland. Webster told the informant during the call that he was sending "his guy" to make the transaction. Boone showed up after that and made the actual transaction. Boone identified himself as "Mike" to the informant.

25. On February 12, 2018, CHS#2 contacted Courtney Webster by calling him at 513-655-0216 to set the details of a heroin transaction. CHS#2 then purchased \$40.00 worth of heroin from Webster at the designated location on West Martin Luther King at Banklick Street. Webster was the passenger inside a gray Honda Accord bearing Florida GYRS13 and an unknown female was the driver.

26. On February 16, 2018, CHS#2 contacted Courtney Webster by calling him at 513-655-0216 to set the details of a heroin transaction. CHS#2 then purchased \$70.00 worth of heroin from Webster at the designated location inside a blue Toyota Corolla bearing KY 660DTK on Holman Avenue near Watkins Street. Webster was the passenger and an unknown male was the driver.

27. On March 15, 2018, CHS#2 contacted Courtney Webster by calling him at 513-655-0216 to set the details of a heroin transaction. CHS#2 then purchased \$70.00 worth of heroin from Webster at the designated location inside of a gray Honda Accord bearing Florida GYRS13 on West Martin Luther King at Banklick Street. Webster was the passenger and an unknown female was the driver.

28. A GPS location search warrant was issued by Eastern District of Kentucky Federal Magistrate Judge Candace Smith for telephone number 513-264-4293. From surveillance

and information received from informants, investigators are aware that Courtney Webster regularly uses this number to discuss drug transactions. Investigators received GPS location points on this phone number between 10/06/2017 and 11/02/2017. Investigators conducted physical surveillance in conjunction with these GPS data points. On October 23, 2017, investigators observed Webster leave his primary residence of 923 Winsray Court, Cincinnati, Ohio in a gray Toyota Camry bearing Ohio HBC4275. A short time later, investigators observed the previously listed vehicle at the Shell Gas Station located at Winton & Galbraith. Investigators observed Webster pumping gas into the Toyota Camry while speaking on his phone. During this observation, the ping data positioned his telephone in the vicinity of 923 Winsray Court before he left and then in the area of the Shell Station while Webster was present at the gas station. In summary, during the GPS ping collection period of 10/06/2017 and 11/02/2017, Webster's phone was regularly located in the vicinity of 923 Winsray Court during nights and early mornings. Based on this information, investigators believe that Webster utilizes 923 Winsray Court as his primary residence. Investigators also conducted physical surveillance during the morning of 4/18/2018 at 923 Winsray Court. At approximately 10:38 a.m., officers observed Webster exiting the front door of 923 Winsray Court and getting in the gray Toyota Camry bearing Ohio HBC4275 and took photographs of Webster walking to his vehicle after exiting his residence. The registered owner of the Toyota Camry is Ciara Hackle, who has been identified as Webster's wife.

29. As discussed above, Webster has used the previously described red Cadillac to conduct multiple heroin transactions. Officers have also recently observed him driving the gray Camry on a regular basis during the period of time covered by the conspiracy. Both vehicles are commonly found in the vicinity of the residence in the Southern District of Ohio.

30. Affiant believes the paragraphs contained above show that probable cause exists to believe that Courtney Webster and others have been conspiring for more than a year on an ongoing basis in the ongoing illegal distribution of heroin in the Eastern District of Kentucky, Southern District of Ohio, and elsewhere. The premises that are the subject of this warrant request are his residence during this time period and vehicles that he regularly uses in the course of the conspiracy. Therefore, Affiant believes that a search of the subject premises will result in the collection of evidence related to Courtney Webster's involvement in the conspiracy to distribute heroin, in violation of 21 U.S.C. §§ 846 and 841(a)(1). Therefore, there is probable cause to believe that contraband, the fruits of crime, or things otherwise criminally possessed, including controlled substances, drug proceeds, records, ledgers, and other items more specifically set forth in Attachment B, which relate to the illegal drug activity by Courtney Webster, and others will be found and seized upon searching the proposed locations as described in Attachment A. **IT IS REQUESTED** that the Court authorize the search of the entire premise and curtilage of 923 Winsray Court, Cincinnati, OH 45224 as described herein as well as the listed vehicles.

Respectfully submitted,


Chris Dees, T.F.O.
Federal Bureau of Investigation

Subscribed to and sworn before me, this 25 day of April 2018.


HONORABLE KAREN L. LITKOVITZ
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A



- a. 923 Winsray Court, Cincinnati, Hamilton County, OH 45224 - a Cape Cod style home comprised of mostly brown brick and has a roof with a steep pitch with brown shingles. Looking from the front, the residence has a brick chimney on the left side. The residence has three windows on the front with two on the first level and one on the second level. The windows are trimmed in white. The front door is situated in the center and has a covered porch with four support posts that are brown. On the brown post for the front porch there is metallic lettering "923." There is also a white storm door attached to the front and there are five large bushes all along the front of the residence. The Court authorizes any proper law enforcement officer to search the entire Premises and its curtilage and seize any evidence within the categories described pursuant to the specifics of Attachment B.
- b. Red 2009 model Cadillac with four doors, carrying Ohio license GLJ 8344 and vehicle identification number 1g6df577490163928 – this vehicle is registered to Ciara Hackle and is commonly found in the area of 923 Winsray.
- c. Gray 2014 model Toyota Camry with four doors, carrying Ohio license HBC4275 and vehicle identification number 4t1bf1fk9eu339499 – this vehicle is registered to Ciara Hackle and is commonly found in the area of 923 Winsray.

ATTACHMENT B:

The items to be seized are evidence of violations of 21 U.S.C. §§ 841(a)(1) and 846, specifically:

1. Any and all controlled substances;
2. United States currency;
3. Items indicating ownership and control of the area searched such as photographs, clothing, mail, personal documents bearing identifying information;
4. Ledgers, customer lists of narcotics distribution, narcotic supplier lists, correspondence, notations, logs, receipts, journals, books, records and other documents (including computer disks) noting the price, quantity, and/or times when narcotics were obtained, transferred, sold, distributed, and/or concealed;
5. Books, records, receipts, computer storage media, electronic information storage devices, bank statements and records, wire transfer records, money drafts, letters of credit, money order and cashier's check receipts, passbooks, bank checks, accounting of expenditures made and payments received, safe deposit box keys and records, money wrappers, rubber bands, money containers, safes, financial records, and notes showing payments, receipt, concealment, transfer, or movement of assets generated from the sale of narcotics;
6. Cellular telephones, beepers, personal telephone and address books, listings, letters, cables, telegrams, telephone bills, including cellular telephone and beeper bills, fax messages, fax logs, telephone message records, telephone electronic storage devices, personal notes, photographs, calendars, diaries and other items reflecting names, addresses, telephone numbers, communications, and illegal activities of associates in drug trafficking and money laundering activities;
7. Financial instruments purchased with large amounts of currency derived from the sale of controlled substances, including traveler's checks, bonds, stock certificates, cashier's checks, money orders, and certificates of deposit; money counting machines; money wrappers, boxes, bags, briefcases, suitcases or containers used to carry currency or controlled substances;
8. Records, documents and deeds reflecting the purchase or lease of real estate, any vehicles, or other items, obtained with the proceeds of the sales of controlled substances;
9. Records, items and documents reflecting travel for the purpose of participating in narcotics trafficking, including passports, airline tickets, credit card receipts, travel vouchers, hotel and restaurant receipts, canceled checks, maps and written directions to locations;
10. Photographs and electronic images, such as video recordings and tape recordings which document the association with other co-conspirators; and
11. Firearms and ammunition.